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1 Jeffrey S. Facter (State Bar No. 123817)  
Patrick D. Robbins (State Bar No. 152288)  
2 Justin S. Chang (State Bar No. 205925)  
Mikael A. Abye (State Bar No. 233458)  
3 SHEARMAN & STERLING LLP  
525 Market Street, Suite 1500  
4 San Francisco, CA 94105-2723  
Telephone: (415) 616-1100  
5 Facsimile: (415) 616-1199  
Email: jfacter@shearman.com  
6 probbins@shearman.com  
jchang@shearman.com  
7 mabye@shearman.com

8 Attorneys for Defendant Frank C. Lin

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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN JOSE DIVISION

13 IN RE TRIDENT MICROSYSTEMS, INC.  
14 DERIVATIVE LITIGATION

Case No.: C 06-3440-JF

15  
16 This Document Relates to:

17 ALL ACTIONS

18 STIPULATION AND ~~PROPOSED~~  
19 ORDER SETTING BRIEFING  
20 SCHEDULE FOR DEFENDANT  
21 FRANK LIN'S MOTION TO DISMISS  
22 PLAINTIFFS' SECOND AMENDED  
23 CONSOLIDATED VERIFIED  
24 SHAREHOLDER COMPLAINT AND  
25 SETTING DATE FOR RESPONSE OF  
26 DEFENDANT TRIDENT  
27 MICROSYSTEMS, INC. TO PLAINTIFFS'  
28 SECOND AMENDED COMPLAINT AND  
DEFENDANT LIN'S COUNTERCLAIM

1 WHEREAS, on May 28, 2010, during a status conference in this matter, the Court  
2 set a hearing for October 29, 2010 at 9:00 a.m. for defendant Frank Lin's anticipated motion to  
3 dismiss plaintiffs' amended complaint;

4 WHEREAS, on July 1, 2010, plaintiffs filed a Second Amended Consolidated  
5 Verified Shareholder Complaint ("SAC");

6 WHEREAS, plaintiffs and Mr. Lin, through their counsel have conferred and  
7 agreed to a briefing schedule concerning Mr. Lin's motion to dismiss the SAC;

8 WHEREAS, Mr. Lin and nominal defendant Trident Microsystems, Inc.  
9 ("Trident"), through their counsel and in light of ongoing mediation with the Honorable Justice  
10 Howard B. Weiner (ret.), have conferred and agreed to a response date to the counterclaim filed by  
11 Mr. Lin against Trident;

12 THEREFORE, IT IS STIPULATED AND AGREED AS FOLLOWS:

13 1. Mr. Lin shall file his motion to dismiss the SAC on or before September 1,  
14 2010;

15 2. Plaintiffs shall file their brief in opposition to Mr. Lin's motion to dismiss  
16 on or before October 1, 2010;

17 3. Mr. Lin shall file his reply brief in support of his motion to dismiss on or  
18 before October 22, 2010; and

19 4. The hearing for Mr. Lin's motion to dismiss the SAC shall be on  
20 November 5, 2010 at 9:00 a.m.

21 5. Any responsive pleading by Trident to the SAC shall be filed on or before  
22 September 1, 2010. If such pleading is filed, and it is a motion brought under Rule 12 of the  
23 Federal Rules of Civil Procedure, such motion shall be briefed and heard on the same schedule as  
24 set forth above for Mr. Lin's motion.

25 6. Any responsive pleading by Trident to the counterclaim of Mr. Lin shall be  
26 filed on or before September 1, 2010. If such pleading is filed, and it is a motion brought under  
27 Rule 12 of the Federal Rules of Civil Procedure, such motion shall be briefed and heard on the

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1 same schedule as set forth above for Mr. Lin's motion.

2  
3 Dated: August 18, 2010

SHEARMAN & STERLING LLP

4  
5 By: /s/  
Mikael A. Abye

6 Attorneys for Defendant Frank C. Lin

7 Dated: August 18, 2010

DLA PIPER LLP (US)

8  
9 By: /s/  
Nate McKitterick

10 Attorneys for Nominal Defendant Trident  
11 Microsystems, Inc.

12  
13 Dated: August 18, 2010

ROBBINS GELLER RUDMAN & DOWD LLP

14  
15 By: /s/  
Christopher M. Wood

16  
17 BARROWAY TOPAZ KESSLER  
MELTZER & CHECK, LLP


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19 By: /s/  
Robin Winchester

20 Co-Lead Counsel for Plaintiffs

21  
22 **ORDER**

23 PURSUANT TO STIPULATION, IT IS SO ORDERED,

24  
25 Dated: 8/20/2010

26   
The Honorable Jerome F. Fogel  
United States District Judge

ATTESTATION PURSUANT TO GENERAL ORDER 45

I, Mikael A. Abye, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order. In compliance with General Order 45, X.B., I hereby attest that Nate McKitterick, Christopher M. Wood, and Robin Winchester have concurred in this filing.

DATED: August 18, 2010

By: \_\_\_\_\_/s/  
Mikael A. Abye